

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA *ex rel.*,
STEPHEN A. KRAHLING and JOAN A.
WLOCHOWSKI,

Plaintiffs,

v.

MERCK & CO., INC.,

Defendant.

Civil Action No. 10-4374 (CDJ)

**DEFENDANT MERCK'S MOTION TO SEAL
MASTER SET OF EXHIBITS FOR MERCK'S
SUMMARY JUDGMENT FILINGS**

Defendant Merck Sharp & Dohme Corporation, formerly known as Merck & Co., Inc. ("Merck"), respectfully requests permission to file under seal its Master Set of Exhibits for its Summary Judgment Filings (the "Summary Judgment Exhibits").

Merck's Summary Judgment Exhibits have been designated or refer to, quote, and describe information that has been designated in this litigation as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" under the Protective Order (No. 10-4374, Dkt. 69), which provides: "In the event a Party wishes to use any Protected Material or any papers containing or making reference to the content of such material in any pleading or document filed with the Court in these Actions, such pleading or document and any appended Protected Material shall be filed under seal pursuant to the Local Rules of Civil Procedure for the Eastern District of Pennsylvania until such time as the Court orders otherwise or denies permission to file under seal." (*Id.* at 15.)

Accordingly, Merck respectfully requests permission to file its Summary Judgment Filings under seal.

DATED: October 25, 2019

Respectfully submitted,

/s/ Lisa C. Dykstra

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